

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

In re:

CHARLES AND CAROLYN GBUR

Debtors.

Case No. 18-30025

Judge John P. Gustafson

**OBJECTION TO TRUSTEE'S
MOTION TO DISMISS**

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Attorney for Debtors

Now come the Debtors and submit their Objection to the Trustee's Motion to Dismiss.

The reason for this objection is as follows:

The Trustee avers that the secured debt exceeds the limitation of \$1,184,000.00. One of the claims upon which she relies is currently subject to an Objection by the Debtors and are therefore not approved or valid as to be relied upon by the Trustee for the determination of whether or not the limitation has been exceeded. The purported debt, as suggested by the Debtors in the Petition is below the limitation required to be eligible for a Chapter 13.

WHEREFORE, Debtors pray this Court deny the Trustee's Motion and for such other relief as this Court finds equitable.

/s/Deborah Spychalski
Deborah Spychalski, Attorney for Debtors

CERTIFICATE OF SERVICE

I certify that on May 24, 2018, a true and correct copy of the Objection to Trustee's Motion to Dismiss was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

United States Trustee (Registered address)@usdoj.gov Elizabeth A. Elizabeth Vaughan 13ECFNotices@chapter13toledo.com and toledo13@ecf.epiqsystems.com

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Gary W. Osborne for Marlene Ritchie at go@garyosbornelaw.com

Lauren Hume for United States of America at lauren.e.hume@usdoj.gov, northern.taxcivil@usdoj.gov.

And by regular U.S. mail, postage prepaid, on: BMW Financial, c/o AIS Portfolio Services, LP, 4515 N Santa Fe Avenue Dept APS, Oklahoma City, OK 73118.

/s/Deborah Spychalski
Deborah Spychalski